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**UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
LOS ANGELES DIVISION**

In re:  MOHSIN M BHOJANI,  Debtor,	Chapter 7  Case No.: 2:24-bk-12418-BR  Adv. No.: 2:24-ap-01258-BR
MOHSIN M BHOJANI,  Plaintiff,  vs.  U.S. DEPARTMENT OF EDUCATION,  Defendant.	<b>STIPULATION TO DISMISS ADVERSARY PROCEEDING</b>  <b>Continued Status Conference:</b> Date: 7/15/2025 Time: 10:00 AM Courtroom: 1668 Place: 255 E. Temple St., 16th Floor, Los Angeles, CA 90012

TO THE HONORABLE BARRY RUSSELL, UNITED STATES BANKRUPTCY

JUDGE:

Plaintiff and Debtor Mohsin Bhojani (“Plaintiff” or “Debtor”) and defendant United States Department of Education (“Defendant”), by and through their respective counsel of record (“Party” or “Parties”), hereby enter into this stipulation to dismiss this Adversary Proceeding with reference to the following facts and subject to Bankruptcy Court approval:

## I. RECITALS

1. Debtor filed for bankruptcy protection under Chapter 7 on March 29, 2024.
2. Debtor filed this adversary proceeding (the “Adversary Proceeding”) against Defendant on November 6, 2024, for a hardship discharge of his student loans.

3. On December 3, 2024, Defendant timely filed an Answer.

4. On January 3, 2025, Debtor received an email message from his student loans’ servicer Nelnet (“Nelnet”) advising that Debtor’s application for a Total and Permanent Disability (“TPD”) discharge had been approved by Defendant.

5. On May 6, 2025, Defendant provided Debtor with a TPD discharge confirmation letter.
6. Plaintiff has agreed to dismiss the Adversary Proceeding, thereby concluding the Adversary Proceeding in its entirety, because the merits of the Adversary Proceeding have been resolved through the TPD discharge.

## II. STIPULATION

NOW, THEREFORE, in consideration of the foregoing:

1. The Recitals set forth above are hereby incorporated into the Stipulation by this reference.
2. Pursuant to Federal Rule of Bankruptcy Procedure 7041 and Federal Rule of Civil Procedure 41(a)(2), the Parties stipulate to dismiss this Adversary Proceeding in its entirety.
3. Each Party shall bear their own attorney's fees, cost and expenses.

[SIGNATURES ON THE NEXT PAGE]

1 Dated: May 27, 2025

/s/ Gregory Grigoryants  
2 GREGORY GRIGORYANTS,  
Attorney for Plaintiff

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4 Dated: May 27, 2025

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United States Attorney  
DAVID M. HARRIS  
Assistant United States Attorney  
Chief, Civil Division  
JOLENE TANNER  
Assistant United States Attorney  
Chief, Tax and Bankruptcy Section

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